

Exhibit 22

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Via E-mail

Bonita L. Robinson
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Re: *Johnson & Johnson Health Care Systems Inc. v. Save On SP, LLC* (Case No. 2:22-cv-02632-JKS-CLW)

Dear Bonnie,

We write in response to your June 28, 2024 letter concerning alleged deficiencies in SaveOn's productions, your July 17, 2024 letter concerning call recordings allegedly made by Ayesha Zulqarnain, and your colleague's July 18, 2024 email concerning J&J's offer to add Joseph Incelli as a custodian in exchange for SaveOnSP's agreement to add Leslie Kauffman as a custodian.

First, you state in your June 28, 2024 letter that SaveOn "has produced several documents that expressly refer to e-mails or other communications that SaveOnSP has not produced." You then point to one such Teams message, in which [REDACTED]. We have reviewed the email exchange between [REDACTED] from that date. It is not responsive to any of J&J's Requests for Production, nor is it relevant to any of the issues in the case. SaveOn declines to produce it.

Second, in your July 17, 2024 letter, you disagree with our position that [REDACTED], pointing us to a subsequent message at SOSP_2158587. We reviewed that message as part of our investigation, and it does not change our understanding. This dispute is moot, however, because—as we told you in our July 15 letter—SaveOn has produced and will continue to produce recordings in its possession, custody, and control responsive to JJHCS's RFP Nos. 6 and 79. That includes recorded calls from Zulqarnain's personal folders saved in SaveOn's shared drives, which we

understand to be the only location where she stored any recordings of calls with manufacturers.

Third, in your June 28, 2024 letter you ask that SaveOn add Leslie Kauffman as a custodian and state that she “played a central role in SaveOnSP’s efforts to evade detection by drug manufacturers.” We disagree with this characterization. The two documents cited in your letter do not show Kauffman participating in any efforts to “evade detection”; at most, they show her asking coworkers for information about changes in manufacturer practices. SOSP_1034492, SOSP_0786717.

On July 18, you proposed a trade in which J&J would add Joseph Incelli as a custodian if SaveOn would add Leslie Kauffman as a custodian. As you are aware, however, SaveOn has not proposed that Incelli be added as a full custodian but has rather proposed targeted search terms for his files targeted to the relevant work that he performed. *See* June 28, 2014 Letter from E. Snow to J. Long. SaveOn will not agree to add Kauffman as a full custodian, but we are willing to consider a narrowed proposal similarly targeted to relevant work that J&J believes she performed. For instance, the two documents you cite in your letter to show that Kauffman played “a central role” in so-called evasion efforts are from June 2022. SOSP_1034492, SOSP_0786717; any narrowed proposal should, at a minimum, account for the limited time period in which J&J alleges that [REDACTED]
[REDACTED]

Finally, you ask SaveOn to produce “all documents and communications regarding [REDACTED] training material, or manufacturer terms and conditions, including participant lists, associated emails, agendas, meeting minutes, and calendar invitations.” [REDACTED] stands for [REDACTED]. Based on our investigation, the [REDACTED]
[REDACTED]

As Saeli, Reckinger, Calderon, Miller and Dunbar are all full custodians, it is our understanding that any relevant, responsive materials connected with the [REDACTED] that hit on SaveOn’s search terms are already being produced.

We are available to meet and confer.

Sincerely,

/s/ Meredith Nelson

Meredith Nelson
Associate